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18 **ATTORNEYS FOR NHENTAI.NET**

19 UNITED STATES DISTRICT COURT  
20 CENTRAL DISTRICT OF CALIFORNIA

21 PCR DISTRIBUTING CO., a company  
22 organized under the laws of California,

23 *Plaintiff*

24 vs.

25 JOHN DOES 1-20 d/b/a  
26 NHENTAI.NET,

27 *Defendants*

Case No. 2:24-mc-07453-CV-AJR

**DECLARATION OF JENNIFER M.  
RYNELL IN SUPPORT OF  
NHENTAI.NET'S MOTION TO  
DISMISS (FED. R. CIV. P. 12(b)(6))  
AND STRIKE (FED. R. CIV. P.  
12(f))**

Date: TBD  
Place: First Street Courthouse  
350 W. 1st Street, Courtroom 5D  
5th Floor  
Los Angeles, California 90012  
Honorable Judge Cynthia Valenzuela

1 I, Jennifer M. Rynell, hereby state and declare as follows:

2 1. I am a partner in the law firm of Wilson Whitaker Rynell in Dallas,  
3 Texas and one of the attorneys for Nhentai.net admitted *pro hac vice* in the above-  
4 referenced matter. I have personal knowledge of the facts stated herein.

5 2. I provide this declaration in support of Nhentai.net's ("Nhentai.net")  
6 Motions to Dismiss and/or Strike ("Motions").

7 3. Attached as **Exhibit A** is a true and correct copy of the Certificate of  
8 Registration received from the U.S. Copyright Office for Copyright No. TX9-380-  
9 863.

10 4. Attached as **Exhibit B** is a true and correct copy of the Certificate of  
11 Registration received from the U.S. Copyright Office for Copyright No. TX9-312-  
12 666.

13 5. Attached as **Exhibit C** is a true and correct copy of the Certificate of  
14 Registration received from the U.S. Copyright Office for Copyright No. TXu2-409-  
15 564.

16 6. Attached as **Exhibit D** is a true and correct copy of the Certificate of  
17 Registration received from the U.S. Copyright Office for Copyright No. TXu2-417-  
18 803.

19 7. Attached as **Exhibit E** is a true and correct copy of the Certificate of  
20 Registration received from the U.S. Copyright Office for Copyright No. TXu2-390-  
21 196.

22 8. Attached as **Exhibit F** is a true and correct copy of the Copyright Office  
23 catalog printout for Copyright No. TXu002391218.

24 9. Attached as **Exhibit G** is a true and correct copy of the Copyright  
25 Office catalog printout for Copyright No. TXu002435667.

26 10. As shown in **Exhibits A-G**, the Copyright Office Certificates of  
27 Registration and catalog printouts do not indicate that any of the alleged copyrighted

1 material is in the form of videos or images.

2 11. I last visited <https://nhentai.net/g/312283/> on February 6, 2025. On that  
3 date, this website indicated that the first page of the book “Submission Eternal My  
4 Lady, My Master,” was uploaded four years and nine months ago, i.e., in mid-2020.

5 12. I last visited <https://nhentai.net/g/208694/> on February 6, 2025. On that  
6 date, this website indicated that the first page of the book “Hey...Let’s Do It,” was  
7 uploaded seven years and four months ago, i.e., in the fall of 2017.

8 13. I last visited <https://nhentai.net/g/543331/> on February 4, 2025. This  
9 URL does not actually link to any material that appears to be called or relate to  
10 “Sexual Healing.”

11 14. I last visited <https://nhentai.net/g/340116/> on February 4, 2025. This  
12 URL appears to link to a work that has a Japanese title that was uploaded four years  
13 and one month ago.

14 15. Nhentai.net obtained the deposit material from the U.S. Copyright  
15 Office relating to four of the five copyrights originally asserted by Plaintiff. The  
16 page shown in the Motions is a true and correct copy of a page from the book “Hey  
17 ... Let’s Do It,” which is the subject of Copyright Registration No. TX9-380-863.  
18 Nhentai.net obtained the page shown from that deposit material and it is included in  
19 its entirety in Nhentai’s Motions – including the images.

20 16. The page shown in the Motions from the book “Hey ... Let’s Do It”  
21 that is the subject of Copyright Registration No. TX9-380-863 includes selected  
22 phrases such as “That’s her...” and “She’s chubby, but she’s mine.”

23 17. The deposit material from the U.S. Copyright Office for the book “Hey  
24 ... Let’s Do It” (Copyright Registration No. TX9-380-863) includes many other  
25 words and short phrases such as “shlurp,” “plap,” “I need it,” “Take it,” “Open  
26 wide,” “Yesss,” “More,” “Yo! Special delivery,” “Now put it in your mouth,” and  
27 “What’s the blindfold for?”

1 18. Nhentai.net obtained correspondence between Plaintiff and/or JAST  
2 USA with the Copyright Office relating to the five copyrights originally asserted by  
3 Plaintiff. Attached as Exhibit H hereto is a true and correct "Copy of  
4 Correspondence" received from the U.S. Copyright Office for Copyright TX9-380-  
5 863 –"Hey ... Let's Do It!"

6 19. Attached as Exhibit I hereto is a true and correct "Copy of  
7 Correspondence" received from the U.S. Copyright Office for Copyright TX9-312-  
8 666 –"Submission Eternal My Lady, My Master."

9 20. Nhentai.net's counsel, including me, conducted searches in the San  
10 Diego County fictitious business entity records by the filing number Plaintiff  
11 provided in its First Amended Complaint and by all variations of the entity names  
12 involved and were unable to locate the alleged filing.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on February 10, 2025 in Dallas, Texas.

15  
16   
17 Jennifer M. Rynell

18 **CERTIFICATE OF SERVICE**

19 On February 10, 2025, I filed the foregoing document with the clerk of court  
20 for the U.S. District Court, Central District of California via CM/ECF. I hereby  
21 certify that I thereby have served the document on all counsel and/or pro se parties  
22 of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and  
23 the Local Rules.

24  
25   
26 Jennifer M. Rynell  
27